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UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

7
8 LISA ODISHO, an individual,

Case No. 2:23-cv-01196-JAD-MDC

9
10 Plaintiff,

vs.
**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIFTH REQUEST)**

11
12 COSTCO WHOLESALE CORPORATION, dba
13 COSTCO, a foreign corporation; DOES I-X, and
ROE CORPORATIONS I-X, inclusive,

14 Defendant.
15

16 Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, Lisa Odisho
17 ("Plaintiff"), by and through her attorney of record, Paul D. Powell, Esq. and Jonathan Powell, Esq.
18 of the law firm The Powell Law Firm and Defendant, Costco Wholesale Corporation
19 ("Defendant"), by and through its attorneys of record, George M. Ranalli, Esq. and Maegun
20 Mooso, Esq. of the law firm Ranalli Zaniel Fowler & Moran, LLC, and hereby stipulate and agree to
21 a ninety (90) day continuance of the current discovery deadlines to give the parties additional time
22 to conduct discovery and discuss possible resolution. Furthermore, as discussed in Section III
23 below, due to scheduling issues, a number of depositions needed to be scheduled after the current
24 deadline, further necessitating the instant stipulation for extension.
25

I. DISCOVERY COMPLETED

- 26
27 1. Defendant served its Initial Disclosure Pursuant to FRCP 26(a)(1) on August 30,
28 2023;

- 1 2. Plaintiff served her Initial Disclosure Statement on September 5, 2023;
- 2 3. Defendant propounded its First Set of Interrogatories, Request for Admissions and
- 3 Requests for Production of Documents to Plaintiff on October 24, 2023;
- 4 4. Defendant served its First Supplemental Disclosure Pursuant to FRCP 26(a)(1) on
- 5 December 12, 2023;
- 6 5. Plaintiff served her responses to Defendant's First Set of Interrogatories, Request for
- 7 Admissions and Requests for Production of Documents December 13, 2023;
- 8 6. Defendant served its Second Supplemental Disclosure Pursuant to FRCP 26(a)(1) on
- 9 January 9, 2024;
- 10 7. Plaintiff served her First Supplemental Disclosure Statement on March 1, 2024;
- 11 8. Plaintiff served her Second Supplemental Disclosure Statement on March 20, 2024;
- 12 9. Plaintiff served her Third Supplemental Disclosure Statement on April 19, 2024;
- 13 10. Plaintiff served her Fourth Supplemental Disclosure Statement on May 16, 2024;
- 14 11. Plaintiff served her Fifth Supplemental Disclosure Statement on May 31, 2024;
- 15 12. Plaintiff served her First Set of Request for Production of Documents to Defendant
- 16 on June 14, 2024;
- 17 13. Plaintiff served her First Set of Interrogatories and Second Set of Request for
- 18 Production of Documents to Defendant on July 3, 2024;
- 19 14. Plaintiff served her Initial Designation of Expert Witnesses on July 26, 2024;
- 20 15. Defendant served its responses to Plaintiff's First and Second Set of Requests for
- 21 Production of Documents on August 8, 2023;
- 22 16. Defendant took the deposition of Plaintiff on April 12, 2024;
- 23 17. Defendant served its responses to Plaintiff's First of Interrogatories to Defendant on
- 24 September 5, 2024;
- 25 18. Defendant served its Initial Designation of Expert Witnesses and Documents on
- 26 September 26, 2024;

19. Defendant served its First Supplemental Designation of Expert Witnesses and Documents on October 25, 2024;
 20. Defendant served their Third Supplemental Disclosure Statement on November 20, 2024;
 20. Plaintiff served her Sixth Supplemental Disclosure Statement on November 20, 2024;
 21. Plaintiff served her Third Set of Requests for Production of Documents on December 10, 2024. Defendant served their responses on January 13, 2025;
 22. Plaintiff served her Seventh Supplemental Disclosure Statement on December 20, 2024;
 23. Plaintiff served her Eighth Supplemental Disclosure Statement on February 4, 2025;
 24. Plaintiff served her Fourth Set of Requests for Production of Documents on February 5, 2025.
 25. Defendant served Supplemental Responses to Plaintiff's First Set of Interrogatories on January 24, 2025;
 26. Defendant served Supplemental Responses to Plaintiff's First Set of Requests for Production of Documents on January 24, 2025;
 27. Defendant served Responses to Plaintiff's Second Set of Requests for Production of Documents on January 24, 2025;
 28. Plaintiff's deposition was taken on April 14, 2025; and
 29. Defendant's FRCP 30(b)(6) deposition was taken on December 6, 2024.

II. DISCOVERY REMAINING TO BE COMPLETED

1. Expert witness depositions;
 2. Treating physician depositions;
 2. Additional written discovery as needed.

1 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

2 The parties have been diligently engaged in discovery thus far. Additionally, because of
3 scheduling issues, it was necessary to schedule certain depositions outside the current deadlines.
4 The parties needed to complete certain aspects of discovery before scheduling these depositions,
5 including the completion of expert reports and the deposition of the 30(b)(6) for Defendant. Those
6 depositions have now been completed. Currently, the parties have the following depositions set:

- 7
- 8 • Deposition of Jordan Lea, D.C. on February 27, 2025
 - 9 • Deposition of Neville Campbell, M.D. on February 19, 2025
 - 10 • Deposition of Harlyn Veloso, M.D. on March 4, 2025
 - 11 • Deposition of Shivangi Bavishi, P.T. on March 10, 2025
 - 12 • Deposition of Nick Liu, D.O. on March 13, 2025

13 The following depositions are still in the process of being scheduled due to calendaring issues:

- 14
- 15 • Deposition of Priscilla Johnson
 - 16 • Deposition of Ryan Johnson
 - 17 • Deposition of Ameena Khinno
 - 18 • Deposition of Johnny Odisho
 - 19 • Deposition of Trisca Odisho
 - 20 • Deposition of Alice Isho
 - 21 • Deposition of Davida Roberts

22 The parties respectfully suggest that good cause exists to continue discovery for a period of
23 ninety (90) day to permit the parties to further engage in settlement discussions, to allow for the
24 depositions of treating physicians and expert witnesses, and to allow for any other discovery that
25 arises.

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27 ...

28 ...

1 **PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

2 It is hereby stipulated that the discovery cutoff deadline be extended for a period of ninety
 3 (90) days. If approved, the new discovery deadlines would be modified as follows:

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	February 25, 2025	May 26, 2025
Initial Expert Disclosures		Closed
Rebuttal Expert Disclosures		Closed
Dispositive Motions	March 26, 2025	June 24, 2025
Joint Pre-Trial Order	April 24, 2025	July 23, 2025

10 **IT IS SO STIPULATED AND AGREED.**

11 Dated February 19, 2025.

 Dated February 19, 2025.

12 **THE POWELL LAW FIRM**

RANALLI ZANIEL FOWLER & MORAN, LLC

13
 14 /s/ Jonathan Powell
 Paul D. Powell (7488)
 15 Jonathan Powell (9153)
 Attorneys for Plaintiff

16
 17 /s/ Maegun Mooso
 George M. Ranalli (5748)
 18 Maegun Mooso (15067)
 Attorneys for Defendant

19 **ORDER**

20 If dispositive motions are filed, the deadline for filing the joint pretrial order will be
 suspended until 30 days after decision on the dispositive motions or further court order.
 Future extensions will require extraordinary showing of good cause.

21
 22 IT IS SO ORDERED.

23
 24 _____
 Hon. Maximiliano D. Couvillier III
 United States Magistrate Judge
 Date 2/20/2025